

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE
EASTERN DIVISION**

JESSE DEAN, D.C., a Tennessee resident,)	
individually and as a representative)	
of a class of similarly-situated persons,)	
)	
Plaintiff,)	Civil Action No. 19-1204
)	
v.)	CLASS ACTION
)	
CARECORE NATIONAL, LLC, a New)	
York limited liability company,)	
)	
Defendant.)	

DEFENDANT’S CONSENT MOTION FOR EXTENSION OF TIME

Defendant CareCore National (“Defendant”), by and through its undersigned counsel, and with the consent of Plaintiff Jesse Dean, D.C., (“Plaintiff”), hereby moves this Court for an extension of an additional thirty (30) days to respond to Plaintiff’s Complaint (Doc. 1), up to and including Thursday November 7, 2019. In support of this motion, Defendant states as follows:

1. Defendant was served with Plaintiff’s Complaint on September 17, 2019.
2. Defendant’s response is currently due on October 8, 2019.
3. Defendant requests an additional thirty (30) days, up to and including November 7, 2019, to respond to Plaintiff’s Complaint.
4. This is Defendant’s first request for an extension of time.
5. Counsel for Defendant have discussed this matter with Plaintiff’s counsel, and Plaintiff’s counsel consents to Defendant’s requested extension.

WHEREFORE, Defendant CareCore National, LLC, respectfully requests that this Court extend the deadline for Defendant to file its response to Plaintiff’s Complaint, up to and including November 7, 2019, and grant any other and further relief this Court deems appropriate.

Dated: October 3, 2019

Respectfully submitted,

HUSCH BLACKWELL LLP

/s/ Justin L. Jones

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Attorney for Defendant

CARECORE NATIONAL LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 3rd day of October 2019, a copy of the foregoing document was filed with the Clerk of the Court to be served upon counsel of record via the Court's ECF system.

/s/ Justin L. Jones